

The Law Offices of John L. Burris
7677 Oakport Street, Suite 1120
Oakland, California 94621
Telephone: (510) 839-5200

1 **JOHN L. BURRIS, Esq., SBN 69888**
2 **LATEEF H. GRAY, Esq., SBN 250055**
2 **LAW OFFICES OF JOHN L. BURRIS**
3 Airport Corporate Center
3 7677 Oakport Street, Suite 1120
4 Oakland, California 94621
4 Telephone: (510) 839-5200
5 Facsimile: (510) 839-3882
5 john.burris@johnburrislaw.com
6 lateef.gray@johnburrislaw.com

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8 Attorneys for Plaintiff
8 SUSIE ZAHN
9

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 SUSIE ZAHN, individually and as
14 successor-in-interest to Decedent GARY
14 OLDHAM,

15 Plaintiff,

16 v.

17 COUNTY OF ALAMEDA, a
18 municipal corporation; GREGORY J.
19 AHERN, individually and in his
20 capacity as Sheriff for the Alameda
21 County Sheriff's Department; DAVID
22 LINCOLN, individually and in his
23 capacity as a Deputy Sheriff for the
24 Alameda County Sheriff's
25 Department; JESUS RUBALCAVA-
22 GOMEZ, individually and in his
23 capacity as a Deputy Sheriff for the
24 Alameda County Sheriff's
25 Department; and DOES 1-25,
25 inclusive, individually, jointly and
severally,

26 Defendants.

Case No. 4:17-cv-1107-DMR

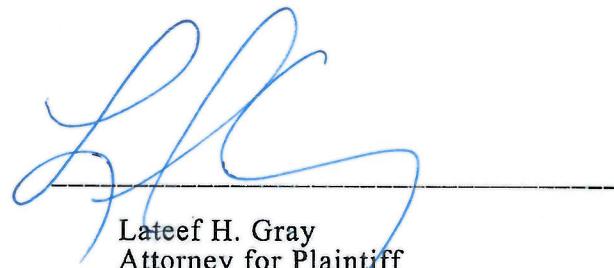
**DECLARATION IN SUPPORT OF
STIPULATED PROTECTIVE ORDER**

1 Pursuant to the Court's Standing Order dated June 23, 2017, the parties hereby
2 declare as follows:

3
4 1. The stipulated protective order submitted by the parties on August
5 18, 2017 is identical to the stipulated model protective order for standard
6 litigation except for the addition of case-identifying information.

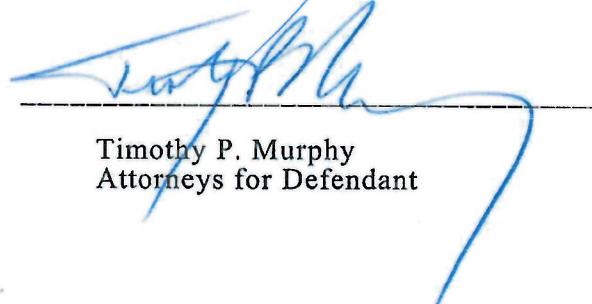
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8 I declare under penalty of perjury under the laws of the United States that the foregoing is
9 true and correct.

10
11 DATED: 08/22/2017



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13 Lateef H. Gray
14 Attorney for Plaintiff

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16 DATED: 8-22-2017



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18 Timothy P. Murphy
19 Attorneys for Defendant

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